UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I

DATE: October 22, 1997

SUBJ: Inspection at Federal Correctional Institution, Danbury (Danbury)

FROM: William A. Osbahr, Environmental Engineer
Investigation and Analysis Unit, IAU

TO: Tom McCusker, Environmental Engineer
Office of Environmental Stewardship, SEA

General Information

Name and Address of Facility:

Federal Correctional Institution, Danbury
Route 37 North
Danbury, CT 06811-3099

Dates of Inspection:

February 24-25, 1997

Participants in Inspection:

William Osbahr, USEPA IAU
James Gaffey, USEPA SER
Anne Fenn, USEPA SAA
Brian Harris, Safety Manager
James Schervinski, Assistant Safety Manager

Background Information

On February 24-25, 1997, I performed an air compliance inspection of Danbury as described below. James Gaffey of EPA's RCRA Technical Unit led a RCRA inspection. I completed a review of Danbury's air related activities.

Facility Description

Danbury is a minimum security federal correctional institute.

The only air regulated emission sources at this facility are three heating boilers. Danbury also operates a wire harness manufacturing facility. Products are manufactured under the UNICOR name. All labor is supplied by Danbury inmates.

Inspection Observations

Danbury operates three boilers within its heating plant. The heating plant was exceptionally clean and well maintained. Heat mechanics perform boiler efficiency tests daily. The primary fuel for these boilers is natural gas. No. 2 diesel (.5% sulfur) oil is used as a backup fuel. I witnessed 0% opacity exiting the boiler stacks. Data from the heating plant is listed below.

Boiler #	Capacity BTU/hr	Model #	Serial #	Fuel	Install. Date
# 1	18,664	WT 100X-A-4	WL 9028	Gas or #2 Diesel	1974
# 2	18,664	""	WL 2100	""	1974
# 3	18,664	""	WL 2099	""	1973

I explained to Mr. Harris, Danbury safety manager, that EPA's Air Facility Subsystem (AFS) data base showed that a state NOV was issued to Danbury in 1994. He said that it was regarding a boiler permit fee payment and not an emission violation. Mr. Harris explained that Danbury paid their permit fee to Connecticut Department of Environmental Protection (DEP). He further explained that the payment was not registered by the DEP and was considered delinquent. The DEP then generated an NOV for non payment. He explained that the issue has since been cleared up.

If you have any questions regarding this report, contact me at (617) 860-4389.

cc: B. Deabay
J. Gaffey
A. Fenn

OIL POLLUTION PREVENTION REGULATION
(40 CFR 112)
SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN
INSPECTION REPORT

OWNER/OPERATOR OF THE FACILITY (List both if different):

Name of Company: FEDERAL CORRECTIONAL INSTITUTION

Type of Business: DOJ PRISON

Mailing Address: RT. 37

DANBURY, CT. 06811-3099

Telephone Number: 203 743-6471

FACILITY INFORMATION:

Address/Location: SAME

Telephone Number: x 471

Person Interviewed: BRIAN K. HARRIS

Title: SAFETY + OCC HEALTH + ENV. MANAGER

1. OIL STORAGE CAPACITY

A. Total Aboveground: 12,350 [✓] gallons [ ] barrels

B. Total Belowground: 5,000 [✓] gallons [ ] barrels

C. Largest Storage Tank: 4,000 UST, 10,000 AST [✓] gallons [ ] barrels

D. Facility Response Plan (FRP) applicability:

Is 40 CFR 112.20 Applicable? [ ] Yes [✓] No

Does This facility have a FRP? [ ] Yes [ ] No [✓] N/A

E. Specific Storage Tank Information (Capacity/Contents):

UTILITY ROOM

3 55-GAL DRUMS 2 NEW OIL, 1 WASTE OIL

BOILER ROOM

50 GAL AST (DAY TANK FOR EMERG. GEN.)

COMPRESSOR ROOM

5-GAL SUMP ON COMPRESSOR

VEHICLE MAINT. GARAGE

1 275-GAL AST, WASTE OIL W/GOOD SEC. CONT.

8 55-GAL DRUMS LUBE, ATF, HYDRAULIC, (CONT. UNDER "ADD. INSP. COMMENTS") (ALL IN OVERPACKS)

2. CURRENT INVENTORY

A. Total Aboveground Inventory: UNK

4. Describe the existing containment and estimate the amount of oil that might be contained (include storage tanks and loading/unloading areas): DRUMS ARE IN OVERPACK DRUMS, PAILS ARE ON CONTAINMENT PALLETS. 10,000 GAL AST HAS DOUBLE-WALL BOX DESIGN.

5. Describe the pathway of an oil spill, from the facility, to the navigable waters of the United States, excluding any manmade structures: DOWN STEEP GRADIENT TO LAKE CANDLEWOOD OR EAST LAKE BROOK.

SPILL PREVENTION CONTROL AND COUNTERMEASURE (SPCC) INFORMATION:

1. Does the facility have an SPCC Plan? (If not, what is the explanation?) (YES) NO

2. Is the SPCC Plan available for review? (If not, what is the explanation?) (YES) NO

3. Has the SPCC Plan been Certified by a Registered Professional Engineer? (YES) NO
   Name: WILLIAM E. OAKLEY ; State PA ; Number: 22646-E (UNDATED)

4. Has the SPCC Plan been fully implemented? (Describe any Deficiencies) YES NO

5. Does the SPCC Plan require amendment? (Describe the amendments) (YES) NO
   THE 3-PAGE "PLAN" DOES NOT ADDRESS THE MINIMUM TOPICS OUTLINED IN 40 CFR PART 112.7. TRANSFORMERS + UNICOR MOULDING MACHINES NOT ADDRESSED. NO NRC + EMERG. RESP. PHONE LIST.

6. Has the SPCC Plan been reviewed? (At least once every 3 years) YES NO (UNK.)
   PLAN WAS NOT DATED.

7. At the time of the Inspection, did the owner/operator have knowledge of the SPCC Regulation? (YES) NO

FACILITY OIL SPILL HISTORY

1. Have there been oil spills in the past? YES (NO)
   - A. Within the facility? YES NO
   - B. Reaching the waters of the U.S.? YES NO

2. Describe any spill events (date; amount spilled; cause of the spill; was the oil contained at the facility; did the oil reach the water; name of the water body; agencies contacted; and countermeasures taken):

ADDITIONAL INSPECTOR COMMENTS

BEHIND GARAGE
1 10,000 GAL AST #2 OIL FOR BOILERS + EMG. GEN.
1 275-GAL AST (TANK ON MILITARY WAGON, USE UNKNOWN.)
FUEL ISLAND
1 4,000 GAL UST, GASOLINE } INSTALLED '88-'89
1 1,000 GAL UST, DIESEL }
TESTED 7-9-96 BY ENVIRO-SHIELD
UNICOR RUBBER MOULDING
4 275 GAL SUMPS ON MOULDING MACHINE 2500 LB PRESS
4 10 " " " " 30 TON PRESS

A copy of the Oil Pollution Prevention Regulation (40 CFR 112) has been provided to the Owner/Operator of the facility at the time of the inspection: (YES) NO

The facility (mark the applicable item):

_____ Appears to be in compliance with the requirements of the Oil Pollution Prevention Regulation (40 CFR 112).

__✓__ Does not appear to be in compliance with the requirements of the Oil Pollution Prevention Regulation (40 CFR 112).

_____ The requirements of the Oil Pollution Prevention Regulation (40 CFR 112) do not appear to apply to this facility.

Inspector's Signature: Donald A. Grant

Inspector Name: DONALD A. GRANT

Date of inspection: FEB 25, 1997

Address all questions and correspondence to:

Donald Grant (SEW)
Region I - SPCC Enforcement Coordinator
U.S. Environmental Protection Agency
JFK Federal Building
Boston, MA 02203

Telephone: (617) 565-3280 FAX (617) 565-1141

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 1
RCRA INSPECTION REPORT

DATE: April 21, 1997

TO: Suzanne Parent, Chief (SP)
RCRA Compliance Unit

FROM: James Gaffey, Chemical Engineer JHG

SUBJ: 1997 RCRA Inspection of the Danbury Federal Prison

I. GENERAL INFORMATION

A. Facility Name:
DOJ Federal Correctional Institute
Danbury Federal Prison
Route 37.
Danbury, CT. 06811

B. Responsible Official:
Charles H. Stewart Jr.
Warden
(203) 743-6471

C. Date of Inspection:
February 25 and 26, 1997

D. Purpose of Inspection:
Multi-Media Federal Facility Inspection

E. Persons Participated in the Inspection:
Jim Gaffey and Bill Osbahr, U.S. EPA

Brian Harris, Occupational Safety & Health Manager
Jim Schervinski, Assistant Occupational Safety & Health Manager

II. RCRA Reporting/Information Requirements

- Facility Identification Number: CTD980730907
- Type of Operation: Generator *(Small Quantity Generator)*
- Date of Original Notification: August 3, 1982
- Type of Notification: Generator *(Large Quantity Generator)*

III. General Facility Description

The facility is a minimum security federal prison for women. The prison switched to an all female institution approximately three years ago. There are approximately 1,000 inmates housed at the prison, with a staff compliment of 312. The prison occupies approximately 329 acres of land and includes numerous vocational and trade shops, a hospital, a vehicle maintenance shop which service the institution's vehicles, and an inmate-employed factory (Unicor) which manufactures cable for the DOD. The prison grounds also includes a "camp" which houses a small number of prisons outside the confines of the prison's security fence, a shooting range, a man-made lake, and an old out-of-service landfill. Although the exact date the landfill stopped receiving waste was not known, Mr. Harris stated that it most likely was some time during the late 1980s. This estimate is based on aerial photography which indicates that no dumping has taken place in the 1990s.

Mr. Harris stated that he was not aware that the facility had notified as a large quantity generator of hazardous waste in 1982. He further stated that they were operating as a small quantity generator, and during some months, generate at a conditionally exempt small quantity generator level.

This inspection report does not include an itemized list of all the waste oil being stored at the facility. Waste oil was being stored at several locations in containers, drums and a 275-gallon aboveground tank.

IV. Physical Inspection - General Observations

A majority of the shops inspected had no hazardous waste being accumulated. Safety Kleen parts cleaners were located in the power plant, the paint shop located within the Inside Mechanical Shops Building, the vehicle maintenance garage, and the ground maintenance shop. The electrical shop, also located within the Inside Mechanical Shops Building included a fluorescent bulb crusher. According to shop representative Mr. Scott Spinella, the shop crushes approximately 1,000 bulbs of various size per quarter. The crusher is equipped with a filter system comprised of three filters which are designed to capture emissions generated during the crushing operation. The unit is attached to a 55-gallon drum which collects the crushed bulbs. The drum is purportedly emptied into a dumpster located outside the building twice a quarter. The drum is typically ½ full when it is dumped into the dumpster. This solid waste, generated from the treatment of a hazardous waste, is being handled as non-hazardous waste without the performance of any sampling and analysis. A representative sample of the crushed glass has never been analyzed to determine if mercury is present above the regulatory level of 0.2 ppm. Mr. Spinella and Mr. Harris stated that the shop was in the process of replacing the crusher unit's filters. They indicated that they intended to handle the filters as mercury contaminated hazardous waste. Mr. Harris also indicated that the facility is presently evaluating whether they will process

fluorescent bulbs in this manner in the future due to a letter from the CT DEP which addresses this matter.

When the EPA inspectors viewed the dumpster which was labeled "Glass Plastic Metal Container", they observed various items including approximately 20 uncrushed fluorescent bulbs, several broken fluorescent bulbs, crushed glass, and metal turnings. A separate dumpster, labeled "Garbage Only" contained numerous light fixtures.

The inspectors proceeded to the Unicor cable factory. All cable soldering is done with 63/37 solder (63 % tin / 37 % lead). The Mil-spec mandates that the solder pots get cleaned out once a month. Numerous soldering pots were observed at work stations through out the factory. Facility representatives were unsure of the quantity of waste solder generated monthly or its disposition. In a telephone conversation on April 21, 1997, Mr. Harris stated that approximately 10 pounds of solder waste is generated monthly. The waste solder was being stored on-site at the time of EPA's inspection in a 30-gallon container located within the inside warehouse. Mr. Harris further stated that the container held approximately three years worth of waste solder, and that the facility had recently arranged to have the waste material recycled via a contractor. Mr. Harris did not know how the facility handled waste solder prior to the time (approximately three years) it was being stored in the 30-gallon container.

Various solvents are used within the Unicor factory. Numerous solvents are used within the factory for various cleaning and surface preparation purposes. For example, cable wire is dipped into a small container of a solvent mixture of MEK and toluene prior to molding. In a telephone conversation on April 21, 1997, Mr. Harris stated that this solvent is actually used to clean molds. He further stated that no waste is generated from this operation. All the solvent is used during cleaning.

The Unicor factory included a locked cage area identified as a hazardous waste storage area. Outside and immediately adjacent to the storage cage is a fire hose station. The storage area included 2 55-gallon drums and an 85-gallon overpack container of waste oil. In addition, there was a flammable cabinet which contained a myriad of small waste items. According to facility representatives, all items in this cabinet are "old, obsolete materials" that they consider waste. Although none of the containers were labeled as hazardous waste or marked in a manner which identified their contents, each item was accompanied by a red "reject tag." Each reject tag included a dated, allegedly the date the material was sent to the storage cage for accumulation prior to disposal, and an identification number (ID#). The ID# was being used to identify the waste material. Each ID# was cross referenced on a log sheet located within the storage cage titled "chemicals in hazardous waste cage." The log sheet identified the items product name and the quantity in storage. The log sheet also cross references each item's MSDS.

The facility also contains a separate hazardous waste container storage building located outside the prison's security fence. The building was properly marked and included items such as a fire

extinguishers, revetted pallets and overpack drums. At the time of the inspection, no waste was in storage. The facility maintained an inspection log for this building, and allegedly performed weekly inspections when the building was in-use. Monthly inspections are conducted when no waste is in storage.

The prison also contained a hospital. The hospital included an x-ray unit which is hard-piped to a silver recovery unit. The silver recovery unit discharges to the sewer. This unit has not generated a spent cartridge in the last five years. Old x-rays are sent to the naval subase in Groton, CT. Allegedly, they are then sent to a Kodak facility to recover the silver. Dental amalgam is also generated at the hospital. A small container (approximately one pint) of waste amalgam was in satellite storage. The container was marked "scrap amalgam" and "biohazard".

V. Record Review

Waste Determination

Much of the facility's waste that was in storage at the time of the inspection was obsolete/past shelf-life materials. Waste determinations for these items were based upon product MSDSs. EPA's record review of the facility's manifests revealed that for other waste streams, waste determinations were made by means of testing and analyzing the waste. The facility relies on the transporter and/or the designated facility for the performance of these waste characterizations. The facility, however, has not maintained any waste analysis documentation for any off-site shipment of these wastes. Danbury therefore did not maintain records of any test results, waste analyses, or other determinations made to satisfy the generator requirements associated with making waste determinations as required by Sec. 22a-449(c)-102 [40 CFR 262.40(c).]

A summary of other specific waste determination concerns is provided below.

1. Manifest CTF0420082 dated 6/25/95 included 3 drums of a waste identified in line item 11.c as "CT Regulated Waste Solid." The manifest also included "A40990-Soil With Chrome" in the additional descriptions for the material listed above box. The waste was originally manifested as a CR05 Connecticut regulated waste. The discrepancy space on the manifest signed by the designated facility indicated that the waste description was changed to "hazardous waste liquid n.o.s. (contains chromium), D007." The complete information included in the discrepancy indication space was; "Item 11.d add hazardous waste liquid n.o.s. (contains chromium), NA3082, D.G. III, 1 DM 55g D007, DM# 342443, S/N A40990." A separate copy of the same completed manifest had written over the "d" in Item 11.d with the letter "c". In a telephone conversation on April 21, 1997, Mr. Harris stated that the manifest was changed improperly by the TSDF. Mr. Harris checked with the TSDF and determined that the manifest change was intended to note that one of the three drums listed in item 11.c had tested positive for the presence of chromium

above the regulatory level. The other two drums were tested and determined to be below regulatory levels.

2. Fluorescent light bulbs and solid waste resulting from the crushing of fluorescent light bulbs were being disposed of as ordinary trash and/or recyclable glass debris without performing waste determinations to insure these solid wastes were not hazardous. Spent fluorescent bulbs typically are hazardous due to the presence of mercury (D009). Additionally, if the fluorescent bulbs are hazardous and the facility is treating (i.e., crushing) the bulbs to render them non-hazardous, they would need to maintain and follow a waste analysis plan as required by 40 CFR 268.7(a)(4). This waste analysis plan would also have to be submitted to EPA.

Manifests & LDR Forms

Numerous problems were identified with the facility's manifesting program and the use of land disposal restriction forms. Problems include the following:

A) Use of an incorrect "Generator's US EPA ID No. (ID#)" in block 1 of the manifest form.

i) Manifests CTF0534666, dated 4/30/96, was used to ship several hazardous waste streams to EWR. The ID# was identified as CESQG.
ii) Manifests CTF0511130, dated 3/6/96, was used to ship a myriad of hazardous waste streams to EWR. The ID# was identified as CESQG.
iii) Manifests MAJ151747, dated 2/22/96, was used to ship photographic fixer to Joseph Freedman Co. The ID# was identified as CESQG.
iv) Manifests CTF0401600, dated 8/2/95, was used to ship several hazardous waste streams to EWR. The ID# was identified as CTD060009040. This ID# belongs to Hoffman Fuel Co. Allegedly, Hoffman was a contractor who originally worked on the remediation project that generated these wastes.
v) Manifests CTF0420082, dated 6/26/95, was used to ship several hazardous waste streams to EWR. The ID# was identified as CTD060009040. This ID# belongs to Hoffman Fuel Co.
vi) Manifests MI3019238, dated 11/1/94, was used to ship lead contaminated hazardous waste solids to Chem Met Services. The ID# was identified as CTP000016276, a temporary identification number.

B) Failure to send copies of manifests used to accompany shipments of hazardous waste to the generator's state (CT DEP) and/or the disposer's state. Copies of the following manifests which were supposed to be mailed to the generator's and/or disposer's state were still in the facility's files. Facility personnel had no knowledge as to whether other copies of these manifests were sent in their stead.

i) Copy 3 (to the disposer's state) and copy 4 (to the generator's state) of manifest

NYC432118-1 dated 10/22/96;
ii) Copy 3 (to the disposer's state) and copy 4 (to the generator's state) of manifest NYC17606-6 dated 7/12/96;
iii) Copy 3 (to the disposer's state) and copy 4 (to the generator's state) of manifest NYC408780-0 dated 5/22/96;
iv) Copy 4 (to the generator's state) of manifest NYC393458-5 dated 3/21/96;
v) Copy 4 (to the generator's state) of manifest NYC380462-5 dated 1/23/96;
vi) Copy 3 (to the disposer's state) and copy 4 (to the generator's state) of manifest NYC365654-2 dated 3/30/95;
vii) Copy 3 (to the disposer's state) of manifest NYC365653-1 dated 8/30/95; and,
viii) Copy 7 (to the generator's state) of manifest CTF0420082 dated 6/26/95.

C) Failure to attach a land disposal restriction (LDR) form to each manifest used to accompany a shipment of hazardous waste and/or retain a copy of the LDR form. The files for the following manifests did not include a LDR form.

i) Manifest NYC430711-7 dated 12/11/96;
ii) Manifest NYC42119-2 dated 10/22/96;
iii) Manifest NYC417606-6 dated 7/12/96;
iv) Manifest MAJ151747 dated 2/22/96;
v) Manifest NYC365654-2 dated 8/30/95;
vi) Manifest NYC365653-1 dated 8/30/95;
vii) Manifest CTF0401600 dated 8/2/95;
viii) Manifest CTF0420082 dated 6/26/95; and,
ix) Manifest MI3019238 dated 11/1/94.

Emergency Procedures

Emergency information was not posted next to telephones at the facility as required by 40 CFR 262.34(d)(5)(ii).

Training

Although safety office staff do attend formal annual training which addresses general environmental issues including RCRA, facility staff personnel who sign manifests, including safety office personnel, do not know that it is their responsibility to insure that all the information contained on the manifest is accurate.

Inspections

The facility maintained an inspection activity notebook for its hazardous waste storage building. A check list or list identifying inspection attributes does not exist. The log indicates that inspections were typically performed monthly. Mr. Harris, however, stated that the building was

inspected weekly when waste was present and monthly when the building was empty of waste. The last 20 entries in the log, from July 19, 1995 through February 25, 1997, are monthly. The only information written for these log entries indicate that no discrepancies were noted. Prior to July 19, 1995, two inspections were annotated in the log for both April and June of 1995. The log entries for both April and June indicate that three unknown waste drums were present at the storage area until June 26, 1995. Manifest CTF0420082 was used to ship five drums off-site on June 26. Two of the five drums contained hazardous waste. All other log entries back to May 19, 1994 were monthly. No inspections were being conducted and/or documented at the Unicor hazardous waste storage area.

Outbrief

The problems identified in this inspection report were discussed during an outbriefing held on February 26, 1997. In addition, the problems were relayed to the facility's environmental contact (Mr. Brian Harris) during a telephone conversation on April 14, 1997.